

Charles Robert Barta, 5/14/2002

Page: 51

1 look at them.

2 Q And what were those players' names?

3 MR. O'NEAL: At this point, I'll impose  
4 an instruction. You can answer that question, but  
5 as I discussed with Ms. Roselle before the  
6 deposition, I'm going to instruct you that you  
7 have a duty to maintain privacy with respect to  
8 patients other than Korey Stringer in this  
9 deposition.

10 So while you can answer a general question  
11 like she asked you, I'm going to instruct you not  
12 to reveal specific medical treatment identified  
13 with specific players. Do you understand that?

14 THE WITNESS: Yes.

15 MR. O'NEAL: Thank you. Do you want  
16 the question read back?

17 BY MS. ROSELLE:

18 Q Who were those players' names?

19 A Korey Stringer, and I will not discuss the other  
20 name.

21 Q No, he said you can give me the name.

22 MR. O'NEAL: You can reveal the name;  
23 you can't reveal the treatment given to that  
24 individual.

25 THE WITNESS: Okay. I'm sorry.

Charles Robert Barta, 5/14/2002

Page: 52

1 A Fred Robbins.

2 Q Had you asked Mr. Robbins to go in the trailer?

3 A Fred had, Fred Zamberletti.

4 Q What position does Mr. Robbins play?

5 A Defensive line.

6 Q What time did Mr. Robbins go in the trailer?

7 A I can't give you an exact time on that. It might  
8 have been closer to 4:20, maybe, somewhere around  
9 that time.

10 Q During July 30th, from the time of the morning  
11 practice through the end of the afternoon  
12 practice, did anyone that you know of go into the  
13 trailer because they were hot, other than  
14 Mr. Robbins and Mr. Stringer?

15 A On July 30th, no, not that I know of, not that I'm  
16 aware of.

17 Q Did you see any other players on July 30th, 2001,  
18 who were complaining about heat cramps or upset  
19 stomachs or were vomiting, other than Korey  
20 Stringer and Fred Robbins?

21 MR. ALSOP: I'll object. That assumes  
22 there was vomiting by Mr. Robbins.

23 MR. O'NEAL: Right. Assumes facts not  
24 in evidence. You can answer.

25 A Okay. There were no other players that had

Charles Robert Barta, 5/14/2002

Page: 62

1       like to get some more Tums.

2       Q     And then you went with him into the training room  
3       to give him Tums?

4       A     Yes.

5       Q     How many Tums did you give him?

6       A     I gave him one of the small rolls. It's like ten  
7       on a roll.

8       Q     Did you discuss anything else with him at this  
9       encounter?

10      A     Just mainly how he was feeling, as far as how he  
11      did overnight, how he slept, and everything else.

12      Q     Okay. What specifically did he tell you?

13      A     He just said he had an upset stomach and he did  
14      okay; he was all right.

15      Q     Do you remember the words he used?

16      A     Not specific words, no.

17      Q     Did you ask him how much liquid he had drunk?

18      A     No, I did not.

19      Q     Did you ask him what his weight was?

20      A     No, but he was -- his weight was on the weight  
21      chart.

22      Q     Did you look at the weight chart?

23      A     Yes.

24      Q     Did you look at the weight chart before you ran  
25      into him in the hallway?

Charles Robert Barta, 5/14/2002

Page: 63

1 A No.

2 Q When did you look at the weight chart?

3 A I generally look at the weight chart right prior  
4 to going out to the field.

5 Q So when you saw him between 8:00 and 8:30, you had  
6 not yet looked at the weight chart?

7 A Correct.

8 Q Did you ask him -- did you feel his skin to see if  
9 he was sweating?

10 A No.

11 Q Did you do any type of an assessment beyond what  
12 you've described?

13 A No.

14 Q Did you talk to him at all about the heat at this  
15 encounter between 8:00 and 8:30?

16 A No.

17 Q Did you give him any kind of warnings about the  
18 heat?

19 MR. O'NEAL: At that encounter, you  
20 mean?

21 BY MS. ROSELLE:

22 Q At that encounter.

23 A No. Continued to tell him to keep pushing the  
24 fluids, "Make sure you drink a lot of fluids."

25 Q Do you specifically remember telling him between

Charles Robert Barta, 5/14/2002

Page: 64

1 8:00 and 8:30 on July 31st, 2001, to drink a lot  
2 of fluids?

3 A Hm-hm.

4 MR. O'NEAL: Your answer was yes to the  
5 last question?

6 THE WITNESS: Yes.

7 BY MS. ROSELLE:

8 Q Did you tell him what fluids he should drink?

9 A Not specifically, no.

10 Q But you specifically remember telling him he  
11 should drink fluids?

12 A I told him to push the fluids.

13 Q Did you tell him anything about what to do if he  
14 didn't feel well?

15 A No.

16 Q Have you told me everything at this encounter  
17 between 8:00 and 8:30?

18 A I believe so, yes.

19 Q When was the next time on July 31st, 2001, that  
20 you saw Korey Stringer?

21 A When he turned an ankle --

22 Q What time was that?

23 A -- during the one-on-one periods. It must have  
24 been between 10:30 and quarter to 11:00.

25 Q And how did you become aware that he had turned an

Charles Robert Barta, 5/14/2002

Page: 65

1 ankle?

2 A I was watching the one-on-ones, the offense and  
3 defensive line work, and I saw him catch a cleat  
4 and go down.

5 Q And then what happened next? Did you go over to  
6 him or did somebody call you or what happened?

7 A I walked over to him as he was -- started walking  
8 toward me.

9 Q How far did he walk towards you?

10 A Five or ten yards.

11 Q Was he sweaty?

12 A Yes.

13 Q Was he slouched over?

14 A A little bit, one side slouched over, because he  
15 was limping.

16 Q Did you observe anything else as you looked at  
17 him?

18 A Nothing unusual.

19 Q When you say he was sweaty, how sweaty was he?

20 A Normal amount for Korey.

21 Q Could you describe for me what a normal amount for  
22 Korey is?

23 A Where the jersey would be somewhat wet and the  
24 pants would be very soaked.

25 Q On that morning of July 31st, 2001, when you saw

Charles Robert Barta, 5/14/2002

Page: 66

1 Korey sometime between 10:30 and 10:45, were his  
2 pants soaked?

3 A I don't recall.

4 Q Okay. I'm going to hand you some pictures and ask  
5 you whether any of these depict the amount of  
6 soaking that you saw on his jersey when he came  
7 towards you on July 31st, 2001, between 10:30 and  
8 11 a.m.

9 MR. O'NEAL: I'll object as calling for  
10 speculation, lacking in foundation.

11 MR. ALSOP: I'll join.

12 MR. O'NEAL: Louise, did you identify  
13 for the record the exhibit numbers you were  
14 handing him? I don't remember.

15 MS. ROSELLE: No. I'm waiting to hear  
16 what his answer is. Then I'll identify them if  
17 applicable.

18 MR. O'NEAL: We should probably  
19 identify all that he's looking at.

20 A It looks like a normal amount for Korey. A lot of  
21 it looks like -- some of it, you get the  
22 overspray. It's hard to tell if it's perspiration  
23 or water that he's drunk out of the water caddy,  
24 but it's about what you usually see with Korey.

25 Q And you're referring to which of these pictures?

Charles Robert Barta, 5/14/2002

Page: 67

1        Could you just read the number?

2        A     4-E. I'm looking for another one where you can  
3        see it. The other one is 4-F.

4        Q     When Korey came towards you between 10:30 and  
5        10:45 a.m., did he have his helmet on?

6        A     Yes.

7        Q     Was his face sweaty?

8        A     Yes.

9        Q     Could you tell if he was flushed?

10       A     He didn't appear to be flushed.

11       Q     Did he walk straight?

12       A     Well, he was limping.

13       Q     Was he moving fast or slow?

14       A     He was going his speed. I can't say it's fast nor  
15       slow.

16       Q     Okay. He came over to you? Well, you kind of  
17       walked towards him?

18       A     We met each other, yes.

19       Q     Okay. And then what happened?

20       A     I asked him what happened. He said he turned his  
21       ankle. He said, "Just spat me up and get me  
22       going." Spatting is taping over the top of the  
23       shoe.

24       Q     And did you do that?

25       A     I told him, "Wait. Let's take a look at the



Charles Robert Barta, 5/14/2002

Page: 68

1 ankle." I said, "How did you turn it? Did you  
2 turn it like a basketball sprain?" He said,  
3 "Yes." A basketball sprain being an  
4 inversion-type sprain, the foot goes in, turns it  
5 in.

6 I went and did an evaluation on his ankle,  
7 quick field evaluation, and determined there was  
8 nothing significant with his ankle going on. Told  
9 him we'd spat him. As I was talking to him, he  
10 had taken off his helmet, sat down, put his leg up  
11 on top of his helmet. I went ahead and spat  
12 him.

13 Q When he took his helmet off, was his head wet from  
14 perspiration?

15 A Tough to tell if his head was. His face was, yes.

16 Q His face was wet?

17 A Yes.

18 Q Was the sweat dripping down his face?

19 A I can't recall that.

20 Q Did you ask him any questions during this  
21 evaluation about the heat?

22 A No, I did not.

23 Q Did you ask him how much he had been drinking?

24 A No.

25 Q Did you have any conversations about drinking

Charles Robert Barta, 5/14/2002

Page: 69

1 fluids during this encounter?

2 A Not drinking fluids, no, I did not. As I helped  
3 him get back up again, grabbed his hand, gave him  
4 a pull up, I asked him how he was doing and he  
5 said fine.

6 Q Did you ask him how his stomach was?

7 A No, not specifically.

8 Q When you asked him how he was doing, were you  
9 referring to his ankle or to his whole person?

10 A His whole person.

11 Q Okay. Do you know what he -- whether he  
12 understood you to be asking about his whole person  
13 when he answered?

14 A I would think so because we were done talking  
15 about his ankle and it wasn't until I was helping  
16 him up. And he wasn't even able to stand on the  
17 foot to find out if it was -- how the ankle felt.

18 Q He couldn't stand on his foot?

19 A No, it was prior to him even standing up and  
20 putting weight on his foot, so I would expect that  
21 he knew I was talking about the whole him and not  
22 just his ankle.

23 Q And how long did this encounter last?

24 A Maybe five or six minutes.

25 Q All right. And then he went back to the field?

Charles Robert Barta, 5/14/2002

Page: 149

1 MR. DeMARCO: Even though it's not  
2 asking for anybody's identity?

3 MR. O'NEAL: Yes.

4 MS. ROSELLE: And even though all those  
5 statements were made to the press about heat  
6 cramps?

7 MR. O'NEAL: I don't need to argue with  
8 you.

9 MS. ROSELLE: All right.

10 BY MS. ROSELLE:

11 Q What did you redact from the rest of page 3984?

12 A They would have been other players with other  
13 injuries.

14 Q Okay. Now, on 3985, you have one, two, three,  
15 four, five, six, seven, eight, nine, ten players  
16 who had heat illness; is that correct?

17 A Yes.

18 Q Each of the lines that have the word "Heat"  
19 represents a different player?

20 A Yes.

21 Q Okay. And four of those players got IVs on  
22 Tuesday, July 31st, 2001?

23 A Yes.

24 Q Were any of those IVs administered at the training  
25 facility?

Charles Robert Barta, 5/14/2002

Page: 150

1 A No.

2 Q Where were those IVs administered?

3 MR. ALSOP: Object on the basis of  
4 foundation.

5 BY MS. ROSELLE:

6 Q Do you know where those IVs were administered?

7 A Yes.

8 Q Where were they --

9 A I believe I know. They were either at the  
10 hospital or at Dr. Knowles' clinic.

11 Q Did you send players, other than Korey Stringer,  
12 on July 31st, 2001, to a hospital?

13 A I sent them over to see the physician, yes.

14 Q Did you send them to a hospital?

15 A Like I said, the hospital and the clinic are put  
16 together there. I don't know if they ended up at  
17 the hospital or if they were at the clinic.

18 Q What time did you send them?

19 A That would have been anywhere from about 12:15, 12  
20 o'clock, till about 2 o'clock.

21 Q And just so --

22 A I can't say for sure. It was early afternoon.

23 Q Now, going back to 3984, as I understand your  
24 testimony, the first two redacted, plus Korey  
25 Stringer, refer to people who had heat illness

Charles Robert Barta, 5/14/2002

Page: 151

1 from July 30th that you were seeing again on July  
2 31st; is that correct?

3 A Hm-hm. (Witness moves head up and down.)

4 Q So there was one person --

5 MR. O'NEAL: You need to say yes or no.

6 A I'm sorry. Yes.

7 Q So there's one person on July 31st, on the first  
8 page, being 3984, who's a new heat person?

9 A That's correct.

10 Q And then there are three people on this 3985 that  
11 are new people, right?

12 A That is correct.

13 Q So there were a total of 11 people on July 31st,  
14 2001, that were treated because of heat?

15 A Correct.

16 Q And these are all players?

17 A That's correct.

18 Q And so it's more than ten percent, isn't it?

19 A Yes.

20 Q Do you know what the actual percent is?

21 A No.

22 Q And as I understand your testimony, you refuse to  
23 tell me what were the symptoms that these people  
24 presented with; is that true?

25 MR. O'NEAL: I've instructed him not to

Charles Robert Barta, 5/14/2002

Page: 152

1 tell you that.

2 BY MS. ROSELLE:

3 Q Okay. With regard to Korey Stringer on page 3985,  
4 you have note 3. What does that note say?

5 A Comment 3, "Athlete was taken by ambulance to the  
6 hospital after becoming semi-unconscious in the  
7 mobile AT."

8 Q And is that your writing?

9 A Yes.

10 Q Now, where did you get that information?

11 A From talking to Fred Zamberletti.

12 Q Now, on page 2 here of July 31st, page 3985, under  
13 the first column which discusses whether it's a  
14 new injury or repeat injury?

15 A Yes.

16 Q Okay. The five people at the top of the page that  
17 had heat injury, none of those had an "N"; is that  
18 correct?

19 A That's correct.

20 Q Then Korey Stringer did not have an "N"?

21 A That's correct.

22 Q And then you redacted the four at the bottom,  
23 correct?

24 A Yes.

25 Q Okay. Well, did any of the four at the bottom

# **Fred Zamberletti Deposition Excerpts**

Fred John Zamberletti, 5/29/2002

Page: 1

1 STATE OF MINNESOTA DISTRICT COURT  
2 COUNTY OF HENNEPIN FOURTH JUDICIAL DISTRICT

3 -----

4 Kelci Stringer, individually, and as  
5 Personal Representative of the Estate  
6 of Korey Stringer, and as Trustee for  
7 the Heirs and Next-of-Kin of Korey  
8 Stringer, and Kodie Stringer, a Minor,  
9 through his Parent and Natural Guardian,  
10 Kelci Stringer, and Cathy Reed-Stringer  
11 and James Stringer,

12 Plaintiffs,

13 v.

14 Minnesota Vikings Football Club, LLC,  
15 and Dennis Green and Michael Tice and  
16 Fred Zamberletti and Chuck Barta and W.  
17 David Knowles, M.D. and Mankato Clinic,  
18 Ltd. and John Does 1 through 30 Natural  
19 Persons or Entities Whose Names or  
20 Identities are Unknown to Plaintiffs,

21 Defendants.

22 -----

23 DEPOSITION OF

24 FRED JOHN ZAMBERLETTI

25 Taken May 29, 2002  
Commencing at 9:10 a.m.

26 REPORTED BY DEBRA MCCAULEY POLLARD  
27 PARADIGM REPORTING & CAPTIONING INC.  
28 1400 RAND TOWER  
29 527 MARQUETTE AVENUE SOUTH  
30 MINNEAPOLIS, MINNESOTA 55402  
(612) 339-0545



Fred John Zamberletti, 5/29/2002

Page: 46

1 A The ice bags were kind of laying on the floor  
2 there.

3 Q What kind of ice bags?

4 A They were a plastic bag.

5 Q You mean like a 20-pound ice bag you buy at the  
6 grocery store?

7 A I don't know if I can tell you what poundage they  
8 are, but it was a bag that you would buy at the --  
9 a Ziploc bag that you -- I believe that, that it  
10 was a bag. That's what it appeared to me.

11 Q You don't think this was a bag like the bag the  
12 ice came in; you think this was like a Ziploc bag?

13 A Smaller bag.

14 Q That the ice had been put into?

15 A Yes.

16 Q These bags of ice that were nearby, how many were  
17 there?

18 A I don't know that.

19 Q Were they just laying on the floor of the trailer?

20 A They had been used.

21 Q But you don't know for what?

22 A No.

23 Q And how do you know they had been used?

24 A They were partially melted. If they wouldn't have  
25 been used, they would have been placed in a

Fred John Zamberletti, 5/29/2002

Page: 47

1 container.

2 Q Because they were partially melted?

3 A Well, just because trainers wouldn't leave them  
4 laying there. They would have been discarded if  
5 they -- they would have been in the container and  
6 they wouldn't have been taken out of the container  
7 if they hadn't been used.

8 Q So when you came in this trailer, you saw some  
9 bags that looked like Ziploc bags that were filled  
10 partially with water that you think had been ice  
11 and melted?

12 A There was ice in there.

13 Q So it was partially melted ice?

14 A Yes.

15 Q And there were how many -- and you don't know how  
16 many?

17 A I don't know how many.

18 Q And you don't know where they were?

19 A They were on the floor. Some could have been on  
20 the table. I don't know.

21 MR. O'NEAL: Just so the record is  
22 clear--I'm not sure it is--did you say you don't  
23 know that they were on the floor or, "I don't  
24 know," period. "They were on the floor."

25 A I don't know period.

Fred John Zamberletti, 5/29/2002

Page: 48

1 MR. O'NEAL: Okay.

2 BY MS. ROSELLE:

3 Q Okay. Now, did Korey still have his pants with  
4 the pads on?

5 A I don't know that.

6 Q You don't recall?

7 A No.

8 Q You didn't look at his lower body?

9 A I looked at his lower body but I couldn't tell if  
10 there was pads or what was going on.

11 Q Could you tell if the pants were wet?

12 A Yes, the pants were wet.

13 Q Did you look to see if Korey was sweating?

14 A I felt that he was.

15 Q Why do you say that?

16 A Well, when I felt him, of course, his shirt was  
17 real wet and he didn't feel hot to me.

18 Q Did he feel damp?

19 A Yes.

20 Q So he felt damp and cool or damp and not hot?

21 A He didn't -- the room was real cool and he had  
22 been in there a period of time before I got there  
23 and he did not feel -- he didn't feel hot to me.

24 Q Okay. What part of his body did you feel?

25 A His back, the back of his neck, because I tried

Fred John Zamberletti, 5/29/2002

Page: 49

1 to -- I was trying to get -- I always used the  
2 carotid to take a pulse. And the pulse was real  
3 rapid, but his head movements were kind of moving  
4 like -- were moving, and I knew his past pulse was  
5 fast.

6 Q So you came in the trailer and you went right to  
7 his carotid artery?

8 A The first thing I went to -- I knew that he was --  
9 that his circulation -- that his heart was  
10 beating.

11 Q And how did you know that?

12 A Because I could tell by his breathing and  
13 everything that he was not in cardiac arrest. And  
14 then I knew that he had an airway. And with this  
15 breathing so rapidly, I felt he was in  
16 hyperventilation.

17 Q When did you go and touch his skin?

18 A My initial -- I didn't touch his skin until after  
19 we put the ice bag on him. We tried to take care  
20 of his hyperventilation.

21 Q All right. When you say ice bag, you're referring  
22 to the fact that you took a plastic bag -- strike  
23 that. You're referring to the fact that you asked  
24 D.J. Kearney to take a plastic bag and put it over  
25 his mouth and nose?

Fred John Zamberletti, 5/29/2002

Page: 50

1 A Yes.

2 Q You never took a bag of ice and put it on Korey  
3 Stringer?

4 A No.

5 Q So when you walked in the trailer, the immediate  
6 thing you did was assess the ABC?

7 A Yes.

8 Q And saw he was hyperventilating and told D.J.  
9 Kearney to put a bag over his face, correct?

10 A Yes, yes.

11 Q And how long do you think that process took?

12 A I don't know. I would say 45 to 60 seconds.

13 Q 45 to 60 seconds from the time you walked through  
14 the door of the trailer?

15 A No. That the bag was on him.

16 MR. O'NEAL: So you mean that was your  
17 estimate of the time the bag was on his mouth? Is  
18 that what you're saying?

19 THE WITNESS: Yes, yes.

20 BY MS. ROSELLE:

21 Q Okay. How long from the time that you walked  
22 through that trailer door to the time that the bag  
23 came off his face?

24 A Came off? Goodness, I would say two to three  
25 minutes.

Fred John Zamberletti, 5/29/2002

Page: 51

1 Q Okay. And when did you touch his skin?

2 A After the bag came off.

3 Q And at that time, you went to touch the carotid  
4 artery?

5 A Yes.

6 Q And did you have to move a towel to touch the  
7 carotid artery?

8 A No.

9 Q By that time, had you looked to see where there  
10 were towels?

11 A No.

12 Q Do you know if there was a towel around his neck  
13 when you went to touch his carotid artery?

14 A No.

15 Q Okay. So you went to the carotid artery, you felt  
16 it, and you felt that he didn't feel hot?

17 A Right.

18 Q And you could feel a pulse?

19 A Oh, yes.

20 Q But you didn't take the pulse?

21 A Rapid. No, I did not take the pulse.

22 Q Okay. Then what did you do?

23 A Then I wanted to get him to the hospital as  
24 quickly as possible.

25 Q Why?

Fred John Zamberletti, 5/29/2002

Page: 52

1 A Because it's just my training that I want to get  
2 people in the hands of medical care.

3 Q You realized that he had a medical emergency at  
4 that point?

5 A Yes.

6 Q Did you realize he had a medical emergency as soon  
7 as you walked through the door?

8 A I knew that it was serious.

9 Q Did you know it was serious before you walked into  
10 the trailer?

11 A No.

12 Q So nothing that D.J. Kearney had conveyed to you  
13 on the way over to the trailer caused you to  
14 understand the seriousness of the situation?

15 MR. O'NEAL: Objection as vague,  
16 multiple.

17 A No.

18 Q So when you walked in the trailer, what was your  
19 understanding of what was going on?

20 A My understanding: That he needed some help to go  
21 to the Taylor Center training room.

22 Q And "he," you mean Korey Stringer?

23 A Yes.

24 Q And that's all you knew?

25 A Yes.

Fred John Zamberletti, 5/29/2002

Page: 53

1 Q So you thought you were going over to the trailer  
2 to help Korey go to the Taylor Center?

3 A Yes.

4 Q What did D.J. say to you?

5 A He said that Paul needed some help to bring him  
6 over to the center.

7 Q And when did D.J. say that to you?

8 A When he came to get me.

9 Q And where were you when you first saw him?

10 A Where was I?

11 Q Yes.

12 A Somewhere around the equipment room. I believe I  
13 was talking to Dennis Ryan.

14 Q Do you know why you were talking to Dennis Ryan?

15 A No.

16 Q Okay. So D.J. came in and came up to you?

17 A Yes.

18 Q Was he running?

19 A Walking briskly.

20 Q And he said to you Paul needed some help to bring  
21 Korey Stringer to the Taylor Center?

22 A Yes.

23 Q Did he convey to you, either by what he said or  
24 his body language, that this was an emergency?

25 A Well, he conveyed to me that they needed help.



Fred John Zamberletti, 5/29/2002

Page: 58

1 A Well, primarily, I felt it on his back. I went  
2 under his T-shirt.

3 Q And when was that?

4 A After I took the carotid pulse.

5 Q And why did you go under his T-shirt?

6 A Well, I just felt that it's tough to feel the  
7 temperature of a body through a T-shirt.

8 Q Okay. So you put your whole hand on his back?

9 A Yes.

10 Q Like the palm of your hand?

11 A No. I put the back of my hand.

12 Q The back of your hand on his back?

13 A Yes.

14 Q You lifted up the wet T-shirt and put your hand on  
15 his back?

16 A Yes.

17 Q Was the T-shirt wet when you touched it?

18 A Yes.

19 Q Soaked?

20 A I don't know about soaked. It was pretty wet.

21 Q And what did you feel when you used the back of  
22 your hand on his back?

23 A I felt that he was warm, but I didn't feel him to  
24 being hot.

25 Q Was his back wet?

Fred John Zamberletti, 5/29/2002

Page: 59

1 A Yes.

2 Q How wet?

3 A Moist.

4 Q When you took your hand out, was your hand wet?

5 A I don't remember that.

6 Q Why did you tell D.J. to stop using the bag?

7 A Well, I didn't want to keep it on there too long.

8 Q Why?

9 A Well, I just felt that too long, it wasn't  
10 necessary and, also, Korey responded.

11 Q How did he respond?

12 A He got up on his knees and turned his head up like  
13 this here (indicating), and then he responded.  
14 And I felt that was long enough and I felt that  
15 nobody's going to die of hyperventilation.

16 Q When you walked in the trailer, Korey Stringer was  
17 laying on his back -- on his side, correct?

18 A Yeah, kind of side and head turned. He was a  
19 little bit turned to the side. Kind of halfway  
20 between -- he was halfway between his side and his  
21 stomach, as I recall.

22 Q So he was maybe three-fourths rolled over?

23 A Well, he was partially rolled over.

24 Q Okay. And his head was leaning on the side  
25 (indicating)?

Fred John Zamberletti, 5/29/2002

Page: 60

1 A His head -- I don't remember. His hands were not  
2 on his head, like you're demonstrating.

3 Q Okay. Here. Was his head laying like this, on  
4 the side (indicating)?

5 MR. O'NEAL: Ms. Roselle has the side  
6 of her head on the table.

7 A No.

8 Q Okay. How was his head?

9 A His head was moving and his head, I can recall,  
10 was off the floor.

11 Q How was it moving?

12 A Up and down, anteroposterior.

13 Q How far off the floor?

14 A I don't remember that.

15 Q Was he making any noises?

16 A He had a noise you could feel from the rapid  
17 breathing.

18 Q Can you describe the noise?

19 A No.

20 Q Was it like a grunt or a groan?

21 A No.

22 Q Okay. And you're saying that when D.J. put this  
23 bag over him, you saw Korey get up on his knees?

24 A I saw him get partially up on his knees. He had  
25 his hand on the floor and he kind of got up like

Fred John Zamberletti, 5/29/2002

Page: 61

1 this here and opened up his eyes, like this  
2 (indicating).

3 Q Well, unfortunately, the court reporter can't  
4 write it down the way you've demonstrated it so  
5 you're going to have to put it in words. Can you  
6 describe it for the court reporter?

7 A Okay. He was partially on his knees and I believe  
8 that his right hand was on the ground--I don't  
9 know whether the left hand was on the ground--and  
10 he turned his head to the left to look at me.

11 Q Did he say anything?

12 A No.

13 Q Do you know if he saw you?

14 MR. O'NEAL: Objection. Lack of  
15 foundation.

16 A I don't know.

17 Q And then what happened?

18 A Then I told Paul to call the van.

19 Q But did Korey lay down again?

20 A Yes.

21 Q And how did he lay down?

22 A In that partially position. I would say more on  
23 his stomach, but kind of in a partially bent  
24 position, partially on his -- he was still kind of  
25 with his body to the left, but he was not -- I

Fred John Zamberletti, 5/29/2002

Page: 62

1 don't recall him being flat on his stomach.

2 Q Was he flat on the floor?

3 A No, he was not on his stomach. I don't know what  
4 you mean flat on the floor.

5 Q Was his head laying on the floor?

6 A No, because his head had the anteroposterior  
7 movement. If his head was flat, he couldn't move  
8 his head if he was laying flat on the floor.

9 Q Were his shoulders on the floor?

10 A I don't remember that.

11 Q Was his torso on the floor?

12 MR. O'NEAL: Objection. Vague.

13 A His knees, hips, stomach. I don't know whether  
14 his shoulders were on the floor. Korey was a  
15 pretty big individual and I don't know whether he  
16 was -- I know that his head was going up and down  
17 and he was kind of -- I don't think he was flat on  
18 the floor, huh-huh.

19 Q Where were his arms?

20 A I don't recall that.

21 Q Just so the record is clear, his knees, hips, and  
22 stomach were on the floor?

23 A Yes.

24 Q What about his feet?

25 A Feet were on the floor.

Fred John Zamberletti, 5/29/2002

Page: 63

1 Q Okay. You're not sure about his shoulders and you  
2 recall his head going up and down, posterior to  
3 anterior?

4 A Anterior to posterior, posterior to anterior.

5 Q And can you tell me the degree of the movement of  
6 his head?

7 MR. O'NEAL: Don't guess. Just answer  
8 as best you can.

9 A I don't know how to describe that. I'd say maybe  
10 a couple inches forward and an inch back.

11 Q Could you tell if the movement of his head was a  
12 voluntary or involuntary movement?

13 MR. O'NEAL: Objection. Lack of  
14 foundation.

15 A I could not tell that.

16 Q How long was he on his knees?

17 A Very short time.

18 Q Couple of seconds?

19 A You're referring to when he responded with the  
20 bag, right?

21 Q Yes.

22 A Yes.

23 Q After you took the bag off, you told Paul to go  
24 outside and call for the van?

25 A Yes.

Fred John Zamberletti, 5/29/2002

Page: 64

1 Q Did you also tell Paul to call Dr. Knowles?

2 A No.

3 Q Why not?

4 A Because he came -- I told him to call the van  
5 immediately. He came back in. Then I told him to  
6 call Dr. Knowles.

7 Q Okay. And why did you tell him to call Dr.  
8 Knowles?

9 A Because we were bringing him in for medical care.

10 Q By the time you asked Paul to call for the van,  
11 did you recognize this as a medical emergency?

12 A Yes.

13 Q And what is your definition of a medical  
14 emergency?

15 A Well, someone that needs to see a doctor.

16 Q Did you recognize this as a life and death  
17 situation?

18 MR. O'NEAL: Objection. Vague.

19 A At that time, no.

20 Q Did you recognize, by the time you asked Paul to  
21 call the van, that this was a heat-related  
22 illness?

23 A I could not tell.

24 Q What were the various diagnoses that you were  
25 considering?

Fred John Zamberletti, 5/29/2002

Page: 65

1 MR. O'NEAL: Objection. Lack of  
2 foundation.

3 MR. ALSOP: I'll join.

4 MS. ROSELLE: Okay. I'll rephrase it.

5 BY MS. ROSELLE:

6 Q What did you think was wrong with Korey Stringer  
7 at the time you asked Paul to call the van?

8 A I did not know. I knew I wanted to get him to a  
9 medical doctor.

10 Q So you sent Paul outside, Paul called the van, and  
11 then Paul came back inside the trailer to call you  
12 that he called the van?

13 A Yes.

14 Q And then you told him to go back outside again and  
15 call Dr. Knowles?

16 A Yes.

17 Q Did you tell him to say anything to Dr. Knowles?

18 A Well, at that time, "Get Dr. Knowles on the  
19 telephone."

20 Q And then did he come back to you again?

21 A Yes.

22 Q And what did he say to you?

23 A He said that his nurse would have him call me.

24 Q And then what happened?

25 A He called me.



Fred John Zamberletti, 5/29/2002

Page: 66

1 Q Did he call Paul and then Paul handed you the  
2 phone?

3 A Yes.

4 Q Was Paul outside when Dr. Knowles called?

5 A I don't know that.

6 Q But Paul gave you the phone?

7 A Yes.

8 Q What did you tell Dr. Knowles?

9 A I walked outside, also, and talked to Dr. Knowles  
10 that I was bringing Korey in, that it was a  
11 serious situation, and that -- and he told me, he  
12 said, "Go directly to the emergency room."

13 Q What did you say to Dr. Knowles was causing the  
14 serious situation?

15 A I didn't say anything.

16 Q And how long was it from the time you sent Paul  
17 out to call the van to the time you hung up from  
18 Dr. Knowles?

19 MR. O'NEAL: Objection. Lack of  
20 foundation, given the witness's testimony.

21 A I would say from the time -- bring that back to me  
22 again.

23 Q From the time you first sent Paul out to call the  
24 van to the time you hung up from Dr. Knowles, how  
25 many minutes had passed?

Fred John Zamberletti, 5/29/2002

Page: 67

1 A I don't know. I don't know that exact. I'd  
2 estimate somewhere between three to four minutes.

3 Q Now, after you hung up from Dr. Knowles, what did  
4 you do next?

5 A I came in and I saw that Korey was -- he was not  
6 responding and I then said, "Call for the  
7 ambulance."

8 Q And who did you say that to?

9 A Paul.

10 Q And then did Paul go back outside again?

11 A Yes.

12 Q And then what happened?

13 A He called the ambulance. He came back in and I  
14 told him to go out on the street to direct the  
15 ambulance in.

16 Q Did Paul tell you -- when you told Paul to call  
17 for the ambulance, did he say to you that he had  
18 already done it?

19 A I don't recall that.

20 Q So Paul went outside to call the ambulance, came  
21 back in, told you he had called the ambulance, and  
22 then you told Paul to go out to the street to  
23 direct the ambulance in?

24 A Yes.

25 Q How long -- I'm sorry. What did you do while Paul

Fred John Zamberletti, 5/29/2002

Page: 68

1           went out to direct the ambulance in?

2    A    Well, I was monitoring airway, his breathing,  
3           circulation, in case that I'd have to use CPR.

4    Q    Anything else?

5    A    No.

6    Q    Did you consider putting any ice on him?

7    A    No.

8    Q    Why not?

9    A    Didn't consider it.

10   Q    Did you have any --

11   A    I didn't think it was a heat problem. He didn't  
12           feel real hot to me.

13   Q    Well, would there have been any negative  
14           consequences of putting ice on him?

15   A    I thought the room was very cool and one of the  
16           things with heatstroke is out of the sun, into a  
17           cool area, or any heat problems, but I didn't know  
18           that this was a heat problem for sure. I didn't  
19           know that.

20   Q    What did you think this was?

21                   MR. O'NEAL: Objection. Asked and  
22           answered.

23                   THE WITNESS: Am I to respond?

24                   MR. O'NEAL: Sure.

25   A    I thought there was a possibility he could have

Fred John Zamberletti, 5/29/2002

Page: 69

1 just fainted. I thought that he could have had  
2 the possibility of a seizure, which would have --  
3 could have been done by an insect bite or some  
4 medication that he had taken or something. I  
5 didn't know that. It just didn't appear to me --  
6 it was not clear.

7 Q Were you confused?

8 MR. O'NEAL: Objection. Vague.

9 A I don't think I was confused in the sense that I  
10 knew that I wanted to get him to the hospital.  
11 And I wasn't --

12 MR. O'NEAL: You've answered the  
13 question.

14 BY MS. ROSELLE:

15 Q You knew you wanted to get him to the hospital but  
16 you didn't know what was wrong with him. Is that  
17 your testimony?

18 A Yes, at that time.

19 Q And at that time, you did not recognize that this  
20 was a life and death situation?

21 A I realized that it was a serious situation.

22 Q When you came to the trailer, did you bring a  
23 blood pressure cuff?

24 A No.

25 Q Did you bring a thermometer?

Fred John Zamberletti, 5/29/2002

Page: 70

1 A No.

2 Q Did you bring any type of equipment to do any type  
3 of assessment of Korey Stringer?

4 A No.

5 Q Did you do any type of assessment of Korey  
6 Stringer?

7 A Yes.

8 Q What type of assessment did you do?

9 A The ABCs of first aid.

10 Q Other than the ABCs of first aid, did you do any  
11 kind of assessment of Korey Stringer?

12 A Palpation.

13 Q What did you palpate?

14 A His back, for body temperature.

15 Q I thought you said you put your hand on his back?

16 A Well, that's what palpation is.

17 Q Anything else?

18 A The carotid pulse.

19 Q Anything else?

20 A Visually.

21 Q Anything else?

22 A No.

23 Q Did you, at any time, try to talk to Korey?

24 A No.

25 Q Why not?

Fred John Zamberletti, 5/29/2002

Page: 71

1 A I was very busy with what was going on, trying to  
2 keep a calm scene, trying to talk to a doctor,  
3 trying to go in here and do this. It's not part  
4 of my routine, in seeing a player, that that's  
5 time to be talking to him. My mind is focused on  
6 him.

7 Q Well, aren't there procedures that you follow, as  
8 an athletic trainer, in making an assessment of an  
9 athlete?

10 A Yes.

11 Q And what are those steps?

12 MR. O'NEAL: Objection. Vague.  
13 Doesn't say what kind of presentation.

14 A It would vary according to the injury, but it  
15 would be -- first of all, in a situation like  
16 this, it's the ABCs of first aid, checking the  
17 conditions that are in there. I mean, with the  
18 coolness there, the environment, that would apply  
19 there. But when I go out on the field to see a  
20 player that's there, we have different situations.

21 Q Have you ever heard of a procedure called HOPS,  
22 H-O-P-S?

23 A No.

24 Q Have you heard that part of the assessment by an  
25 athletic trainer includes a history?